REMARKS

This response is to the Office Letter mailed in the above-referenced case on December 20, 2000.

In the action all claims stand rejected under 35 U.S.C. 103(a) over Humpleman, of record, or Humpleman in view of Bingel, of record.

In response to the rather lengthy action the applicant herein amends the claims to focus the Examiner's attention on that which the inventor regards as the patentable subject matter, and which the Examiner has so far neglected to adequately consider, which is the nature of the wiring system in the user site, onto which signals are driven. Claim 1 as amended herein now recites:

1. (Amended) A networking system for a home or business site, comprising:

a bridge adapter unit having an inlet port for receiving public network protocol signals; and

a telephone wiring structure in the site, the wiring structure having multiple end points and one or more junctions, and connected at a single point to an outlet port of the bridge adapter unit;

characterized in that the bridge adapter unit drives the telephone wiring structure according to a Local Area Network (LAN) protocol, translates the public network protocol signals to the LAN protocol, and modulates the signals in a manner to correct signal variations at the end points due to having multiple end points driven from a single point at the bridge adapter unit.

The patentable heart of claim 1 is the positively-recited "telephone

wiring structure", and the way in which the bridge adapter unit drives the wiring structure. The value of the present invention is in the fact that the bridge adapter unit can be connected to an existing telephone wiring structure in a home or business, and re-wiring of the home or business is not required. This is unarguably a significant advantage.

Applicant wishes to focus the Examiner's attention on the recited wiring structure and the way it is driven, because it is precisely these limitations that are not taught in any of the art that the Examiner has relied upon. To avoid confusion, in amended claim 1 the applicant has specifically described the wiring structure as having a single starting point at the bridge adapter unit and multiple end points, having therefore one or more junctions, rather than using words of art like "Asymmetric Star".

Further, applicant respectfully asserts that a prima-facie 103 rejection must show these limitations in the art. The Examiner thus far has not shown these limitations in the art, and indeed, the art cited and applied does not show these limitations. For example, the teaching of Humpleman very specifically shows a Hub 38, with a separate cable running to each room in the house. This is specifically what the present invention was made to overcome. See for example, Humpleman, col. 4, beginning at line 48. A separate twisted pair cable is run from hub 38 to each room in the house, that is, to each outlet. This is not the branched structure specifically recited in claim 1. Humpleman refers in this same passage to the installation of the cables runs, and the labor cost, which is precisely what the present invention is made to overcome.

Further description in Humpleman at col. 5, line 44, further solidifies the fact that the Humpleman system has multiple runs fanning out from hub 38 in a Star topology. Please be aware that hub 38 is a "Switched hub". This is not a junction as claimed. This is abundantly clear from the

description from line 44 of col. 5 to line 3 o col. 6.

Having established that the wiring structure in the user site is fundamentally different in claim 1 and Humpleman, the Examiner's attention is directly focused on the functional limitations in claim 1, which provide the ingredient that allows applicants system to work with an existing telephone wiring structure, while Humpleman's system will not. Specifically, applicant *modulates the signals in a manner to correct signal variations at the end points due to having multiple end points driven from a single point at the bridge adapter unit.*

There is specifically no teaching in Humpleman to modulation to correct signal variations at the end points. There is no need in Humpleman, because the existing telephone wiring is not used in Humpleman, as it is in the applicant's invention as recited in claim 1, and a whole new cabling system is installed in Humpleman. Humpleman's system simply will not operate on the existing telephone wiring of the site, which is precisely why Humpleman teaches complete re-wiring of the site.

Applicant further asserts that a proper rejection, under either 35 U.S.C. 102 or 103, cannot be made by applying a different structure (different invention), that accomplishes the same or a similar purpose. The Examiner's assertions of how Humpleman receives public network signals and converts then in the site to drive the media devices has no weight in a rejection. The invention is not in what is accomplished, but in how in with what it is accomplished. The Examiner, under the law, is constrained to deal with the claimed subject matter.

Applicant therefore asserts once again that the rejections made do not form a prima facie case against claim 1, as the wiring structure as claimed, and the way it is driven, have not been shown in teachings in the art, specifically not in Humpleman. The Examiner is specifically requested

to provide art references that teach that which is claimed.

Applicant asserts that claim 1 as amended is patentable over the art cited and applied, taken either singly or in combination, as the patentable features recited in claim 1, as clearly listed above, are not taught in the art.

Claims 2, 3, and 4 are therefore patentable at least as depended from a patentable claim, and on their merits as well. Claims 5 and 6 are canceled.

Claim 7 as amended herein now recites:

7. (Amended) A method for implementing a networking system, comprising the steps of:

(a) delivering public network protocol signals to the level of a home or business site;

(b) installing a bridge adapter unit having an inlet port for the public network protocol signals at the site;

(c) connecting a telephone wiring structure having multiple end points and one or more junctions, at a single point to an outlet port of the bridge adapter unit;

(d) driving the telephone wiring structure according to a Local Area Network (LAN) protocol by the bridge adapter unit, translating the public network protocol signals into the LAN protocol; and

(e) modulating the signals in a manner to correct variations at the end points due to having multiple end points driven from the single point at the bridge adapter unit.

Claim 7 is a method claim analogous to apparatus claim 1, shown above to be patentable over the art cited and applied. The arguments presented above for patentability of claim 1 therefore apply as well to claim

7. Patentability of claim 7 over the art resides in steps (c) and (e). Step (c) recites connecting to a telephone wiring structure *having multiple end points and one or more junctions, at a single point to an outlet port of the bridge adapter unit.* The art nowhere teaches such a wiring structure used with a networking system as claimed. Step (e) recites *modulating the signals in a manner to correct variations at the end points due to having multiple end points driven from the single point at the bridge adapter unit.* The art nowhere teaches this step. Claim 7 is therefore patentable over the art cited and applied, and claims 8, 9, 16 and 17 are patentable at least as depended from a patentable claim, or on their merits. Claims 10-13 have been canceled.

In addition to the arguments and amendments presented herein, the applicant has caused to be filed a Declaration by an expert in the art, Mr. Michael Potel Ph.D., attesting to specific teachings of Humpleman, in particular, and to the applicant's invention, to aid in the prosecution.

As all of the claims as amended, added and standing for examination have been shown to be patentable over the art cited and applied, the applicant respectfully requests reconsideration, and that the case be passed quickly to issue.

Marked-Up Version to Show Changes

1. (Amended) A [multimedia data distribution] networking system for a home or business site, comprising:

[a home or business site having an existing asymmetric internal telephone wiring;

a distribution system distributing and delivering public network protocol signals from a public network to the level of the home or business;]

a bridge adapter unit having [a single] an inlet port for receiving public network protocol signals [connected to the distribution system and to the existing asymmetric internal telephone wiring]; and

a telephone wiring structure in the site, the wiring structure having multiple end points and one or more junctions, and connected at a single point to an outlet port of the bridge adapter unit;

[one or more converters connected to the existing asymmetric internal telephone wiring, each converter having an outlet for connecting to either a conventional single media or a multimedia electronic device;]

[wherein] characterized in that the bridge adapter unit drives the [existing asymmetric internal] telephone wiring structure according to a Local Area Network (LAN) protocol, [translating] translates the public network protocol signals to the LAN protocol [by modulating the LAN signals onto the existing asymmetric internal telephone wiring], and modulates the signals in a manner to correct signal variations at the end points due to having multiple end points driven from a single point at the bridge adapter unit [and each converter converts the modulated LAN signals

on the existing asymmetric internal telephone wiring to a form required by the connected single media or multimedia device].

2. (Amended) The [multimedia data distribution] networking system of claim 1 [wherein the single and multimedia electronic devices include telephones, personal computers, fax machines, and televisions running through set top boxes] further comprising one or more converters connected at individual ones of the end points, the one or more converters comprising each an outlet port to connect to a single-media or a multi-media device, the converters converting the LAN signals to a form required by the single-media or multi-media device.

3. (Amended) [A home network system, comprising:

an adapter unit having a single inlet port for public network protocol signals and connected to an existing asymmetric internal telephone wiring of a home or business; and

a converter connected to the existing asymmetric internal telephone wiring, the converter having an outlet adapted for connecting to either a conventional or a electronic device;

wherein the adapter unit translates between a public network data protocol at the inlet port and a Local Area Network (LAN) data protocol using hi-frequency, modulated network signals on the existing asymmetric internal telephone wiring, and manages the existing asymmetric internal telephone wiring as a non-isochronous type bus, and the converter converts signals on the existing asymmetric internal telephone wiring to a form required by one of the single media and multimedia electronic devices.] The networking system of claim 2 further comprising one or more single-media or multi-media devices connected to one or more of the converters.

4. (Amended) The [home network] networking system of claim 3 wherein the single-media and multi-media electronic devices include one or more of telephones, personal computers, fax machines, and televisions running through set top boxes.

5. Cancel claims 5 and 6.

7. (Amended) A method for [managing] implementing a [multimedia home network] networking system, comprising the steps of[;]:

(a) delivering public network protocol signals to the level of a home or business site;

(b) [imposing a configurable] installing a bridge adapter unit having an inlet port for the public network protocol signals at the [home or business having a single inlet port connected to the public network and having a connection to an internal network of the home or business, the bridge unit transferring data between the public and internal networks] site;

(c) connecting [addressable clients to the internal network] a telephone wiring structure having multiple end points and one or more junctions, at a single point to an outlet port of the bridge adapter unit;

(d) [sending data from the public network to the bridge unit] driving the telephone wiring structure according to a Local Area Network (LAN) protocol by the bridge adapter unit, translating the public network protocol signals into the LAN protocol; and

(e) [using at least a portion of the data to configure addresses for the clients] modulating the signals in a manner to correct variations at the end points due to having multiple end points driven from the single point at the

bridge adapter unit.

8. (Amended) The method of claim 7 [wherein, in step (b), the bridge unit comprises internal mass storage, and at least some of the data sent in step (d) is stored in the internal mass storage] comprising a further step installing one or more converters connected at individual ones of the end points, the one or more converters comprising each an outlet port to connect to a single-media or a multi-media device, the converters converting the LAN signals to a form required by the single-media or multi-media device.

9. (Amended) The method of claim 8 [wherein the internal mass storage is a hard disk drive] wherein, in the further step, the single-media or multi-media devices include one or more of telephones, personal computers, fax machines, and televisions running through set-top boxes.

Cancel claims 10-13.

Add claims 14-17 for examination as follows:

14. (Added) The networking system of claim 3 wherein individual ones of the converters are integrated into individual ones of the single-media or multi-media devices.

15. (Added) The networking system of claim 3 wherein individual ones of the converters are internal modules of individual ones of the single-media or multi-media devices.

16. (Added) The method of claim 8 wherein individual ones of the

converters are integrated into individual ones of the single-media or multi-media devices.

17. (Added) The method of claim 8 wherein individual ones of the converters are internal modules in individual ones of the single-media or multi-media devices.

If there are any time extensions due beyond any extension requested and paid with this amendment, such extensions are hereby requested. If there are any fees due beyond any fees paid with the present amendment, such fees are authorized to be deducted from deposit account 50-0534.

Respectfully Submitted,

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by _____

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